



California Fair Political Practices Commission

June 27, 1989

Brian W. Maas
Pillsbury, Madison & Sutro
P. O. Box 7880
San Francisco, CA 94120

Re: Your Request for Informal
Assistance
Our File No. I-89-309

Dear Mr. Maas:

You have requested confirmation of telephone advice provided to you concerning the campaign provisions of the Political Reform Act.^{1/}

Your letter, dated May 16, 1989, correctly summarizes my advice that a bank account established at a credit union located in California will satisfy the requirement contained in Section 85201(a) that a candidate establish a campaign contribution account at a "financial institution" located in the state. In addition, I advised that retention of a copy of all checks drawn on the credit union account along with the monthly account statement provided by the credit union would be adequate for recordkeeping purposes, assuming that the candidate could obtain copies of canceled checks from the credit union if necessary. For your convenience, a copy of your letter is enclosed.

^{1/}Government Code Sections 81000-91013. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

Your letter states only a general question. Therefore, we consider it to be a request for informal assistance pursuant to Regulation 18329(c). Informal assistance does not provide the requestor with the immunity provided by an opinion or formal written advice. (Section 83114; Regulation 18329(c)(3).)

Brian W. Maas
Page 2

Please contact me at (916) 322-5662 if you have additional questions.

Sincerely,

Kathryn E. Donovan
General Counsel

A handwritten signature in cursive script that reads "Carla Wardlow".

By: Carla Wardlow
Assistant Chief, Technical
Assistance & Analysis Division

Enclosure

LAW OFFICES OF
PILLSBURY, MADISON & SUTRO

OTHER OFFICES

LOS ANGELES, CALIFORNIA
SAN DIEGO, CALIFORNIA
SAN JOSE, CALIFORNIA
WALNUT CREEK, CALIFORNIA
WASHINGTON, D.C.

POST OFFICE BOX 7880

SAN FRANCISCO, CALIFORNIA 94120

TELEPHONE (415) 983-1000

CABLE ADDRESS "EVANS"

TELEX 34743

TELECOPIER (415) 398-2096

WRITER'S OFFICE AND
DIRECT DIAL NUMBER

235 Montgomery Street
(415) 983-7272

May 16, 1989

Ms. Carla Wardlowe
Technical Assistance Division
Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, CA 95814

Dear Ms. Wardlowe:

This letter seeks to confirm oral advice pursuant to our telephone conversation on May 9, 1989 regarding the use of credit unions as depositories under the Political Reform Act of 1974, (the "Act").

During our conversation, you stated that it is the Commission's position that credit unions are proper depositories under the Political Reform Act, notwithstanding any statements in Commission manuals or regulations which refer to banks or savings and loans. You advised that such statements were not intended to exclude the use of credit unions as proper depositories.

Finally, you indicated that the retention of a copy of each check drawn on a credit union account as well as the monthly account statement showing that the check was paid by the credit union would be sufficient under the Act for recordkeeping purposes.

We would appreciate your confirmation of this oral advice, and we thank you for your assistance.

Sincerely,



Brian W. Maas

89-209

LAW OFFICES OF
PILLSBURY, MADISON & SUTRO

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We would appreciate your confirmation of this oral advice, and we thank you for your assistance.

Sincerely,



Brian W. Maas



California Fair Political Practices Commission

May 23, 1989

Brian W. Maas
Pillsbury, Madison & Sutro
P.O. Box 7880
San Francisco, CA 94120

Re: Letter No. 89-309

Dear Mr. Maas:

Your letter requesting advice under the Political Reform Act was received on May 18, 1989 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

Jeanne Pritchard
Jeanne Pritchard
Chief Technical Assistance
and Analysis Division

JP:plh